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Michael Eisenkraft
(212) 838-0177
meisenkraft@cohenmilstein.com

March 13, 2012

VIA FACSIMILE (212-805-6382)

The Honorable Victor Marrero
United States District Court
Southern District of New York
500 Pearl Street, Room 660
New York, New York 10007

Re: McIntire v. China MediaExpress Holdings, Inc., No. 11 Civ. 804 (VM)

Dear Judge Marrero:

Along with Lead Counsel, Hagens Berman LLP, we represent Plaintiffs in the above-captioned litigation. On February 6, 2012, attorneys for Defendant China MediaExpress Holdings Inc. (CCME); Defendants Malcolm Bird and Theodore Green; Defendant A.J. Robbins, P.C.; Defendant Deloitte LLP, and Defendant Deloitte Touche Tohmatsu Limited (DTTL) (collectively, "Defendants") each filed a separate motion to dismiss and accompanying memoranda of law in the above captioned-case pursuant to this Court's January 6, 2012 order. In accordance with this Court's Individual Practices, each Defendant had 25 pages for their memoranda of law, for a total of 125 pages.

Jeniphr Breckenridge, Lead Counsel for the putative class, contacted Defendants' five sets of Counsel to inform them that Lead Plaintiff planned to file an omnibus memorandum of law in response to Defendants' five separate motions to dismiss and would only be seeking 100 pages to respond to Defendants' 125 pages of briefing, 25 pages less than they would otherwise be entitled to and that an omnibus brief would allow Lead Plaintiff to avoid repetition of common legal standards and authorities and facts.

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None of Defendants' Counsel oppose this request. Specifically, Michael E. Marr, counsel for Defendant A.J. Robbins, P.C., consents to the request. Latham & Watkins, counsel for DTTL, does not oppose the request, nor does Hughes Hubbard, counsel for Deloitte LLP. Morrison Cohen LLP, counsel for Defendants Malcolm Bird and Theodore Green, neither consents nor opposes the request. Counsel for Defendants CCME has not confirmed its position.

In light of the impending March 16, 2012 deadline for the opposition to the motions, Lead Plaintiff hereby submits its request for permission to file a single omnibus brief in opposition to all five motions to dismiss of no more than one hundred (100) pages.

Respectfully submitted,



Michael Eisenkraft

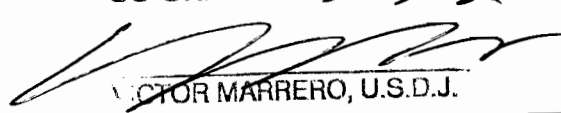
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cc: Defendants' Counsel (via email)

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Request DENIED. Though defendants filed separate motions, they raise common, substantially overlapping legal issues which should have been presented in an omnibus motion. The Court is not persuaded that plaintiffs need 100 pages to respond. In more complicated class actions of similar claims, the Court has imposed a 75-page limitation, which should suffice here. The deadline for filing the response and replies shall be extended in accordance with a revised stipulated schedule. Defendants are directed to confer and propose an agreement to file an omnibus reply addressing common legal issues not to exceed 25 pages.

SO ORDERED: 3-15-12


VICTOR MARRERO, U.S.D.J.